

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

AFFIDAVIT

I, Benjamin Kinsey, Special Agent (SA) of the Federal Bureau of Investigation (FBI),
being duly sworn, state the following is true and correct to the best of my knowledge and belief.

1. I am a Special Agent of the Federal Bureau of Investigation and have been so
employed since October 2007. Prior to that, I was a Police Officer with the Mobile Police
Department in Mobile, Alabama. During my eight years with the Mobile Police Department, I
was assigned as an Auto Theft detective, Homicide detective, and a Sergeant in Internal Affairs.
I am currently assigned to the Violent Crimes Squad within the Kansas City Division of the FBI.
The information in this complaint was obtained by me personally, from other FBI agents, and
from police officers and police officers' official reports.

2. This affidavit is in support of a Complaint and Arrest Warrant for William Alan
Wolfe, white male, DOB: April 6, 1981, for violation of Title 18, United States Code, Sections
371, and 2113(a) and (d), Conspiracy to Commit Bank Robbery and Armed Bank Robbery.

3. On Thursday, July 2, 2009, law enforcement personnel responded to a bank robbery at
the Bank of Brookfield Purden located at 33332 Main, Winigan, Missouri. During the course of
the investigation, it was learned that a lone white male entered the bank at approximately 9:02
a.m. The robber approached the victim teller, Cheryl Crist, and pointed a silver semi-automatic
handgun at her. The robber explained to the victim teller that she was being robbed and ordered
her to provide him with the money. The robber placed the U.S. currency into a black nylon bag
that he had brought into the bank with him. The robber then pointed the pistol at two other
occupants inside the bank prior to his exit. The robber was described as being a white male, 5'9"

to 5'10," wearing a dark colored T-shirt with blue jeans and a camouflaged turkey hunting style mask.

4. After leaving the bank, the robber was observed leaving the area in a vehicle resembling a 1992 white Buick four-door sedan. A second person was observed inside the vehicle and was described as being a white male who was taller and skinnier than the robber.

5. The deposits of the Bank of Brookfield are insured by the FDIC. The loss sustained from the bank robbery was \$25,561.

6. On July 9, 2009, Corporal Brad Ream, Missouri State Highway Patrol, provided SA Kurt Lipanovich with the following information:

A. On July 9, 2009, Corporal Ream displayed a photo line up comprised of 6 photographs, including a photograph of William Alan Wolfe, to John Crist. Crist a distant relative of the victim teller, Cheryl Crist. Crist picked out the photograph of Wolfe as the driver of the vehicle he observed on the morning of July 2, 2009, about a half a mile from Winigan, Missouri. Crist was certain of his identification of Wolfe.

B. On July 2, 2009, at about 8:15 a.m., Crist was driving west on Lama Road and started to turn south on to Melon Drive, but was prevented from doing so by a vehicle parked in the middle of the road. It should be noted both roads are narrow gravel country roads. Crist described the vehicle blocking the road as a 1990s model white Buick with two white males.

C. When Crist started to turn onto Melon, he saw the driver was out of the car looking into the trunk. The driver then returned to the driver's seat and the passenger got out and went to the trunk. The passenger rummaged around in the trunk for a couple of minutes, during which time Crist clearly observed the driver from a distance of approximately 75 feet. The passenger

then returned to the passenger seat and the vehicle started up and headed east toward the town of Winigan.

7. A Google Maps search was conducted that determined the time it would take to travel from the Bank of Brookfield Purden located at 33332 Main, Winigan, Missouri, to William Alan Wolfe's residence located at 6801 County Road 424, Fulton, Missouri. The Google Maps search indicated such a trip would take an estimated 3 hours and 15 minutes.

8. On July 7, 2009, law enforcement personnel responded to a bank robbery at Community State Bank, located at 300 East Hazel, Clarence, Missouri.

9. On July 7, 2009, SA Keith Kohne interviewed Megan Hillard, bank teller for the Community State Bank. She provided the following information:

A. At approximately 9:30 a.m., on July 7, 2009, a white male, hereafter referred to as the robber, entered the bank. He approached Hillard at the teller's counter. The robber was wearing a silver-colored mask that covered his face and head but not his neck. He was carrying a silver, semi-automatic handgun and black duffle bag. The robber provided the bag to Hillard and instructed her to place the money in the bag. Hillard did as instructed and placed U.S. currency in the bag. The robber then asked to get into the vault but Hillard and Kenneth Spencer (another employee of the bank) told him that they could not access the vault. The robber then exited the bank.

B. Hillard described the robber as a white male, approximately 6' tall with a thin build. Through the robber's mask, Hillard could see that he had strawberry-blonde facial hair. He was wearing a dark-colored, short-sleeved t-shirt and black jogging pants with white stripes down the sides.

10. At approximately 10:30 a.m., on July 7, 2009, Robert Hall provided a written statement to Dennis Perrigo, Clarence Police Sheriff. Hall reported that:

A. On July 7, 2009, he observed a male running in front of him, wearing a short-sleeved black shirt and black pants and carrying a black duffle bag. The male was 6' tall with a skinny build and his hair was short in length. The male ran into a funeral home parking lot and entered the passenger side of a white, 1990s model Pontiac Bonneville with damage to the front end. The vehicle was occupied by a driver. The vehicle left the parking lot and drove East on Hazel Street then turned on Business 36.

11. Beth Rickerson, Cashier and Security Officer for the bank reported that the loss to the bank as a result of the robbery was \$4,700.69. Kenneth Spencer, Bank Manager, advised that the deposits located within the bank are insured by the FDIC under certificate number 22567-3, effective August 8, 1994.

12. On July 9, 2009 Lieutenant Michael Platte of the Missouri State Highway Patrol spoke with Russell D. Chittum. Chittum works at the D&B Market, 219 East Chestnut, Clarence, Missouri. D&B Market is located about three blocks from the Community State Bank. Chittum said he was working at the store on the morning of July 7, 2009. While he was working, he observed two customers enter the business at approximately 8:30 a.m. Chittum had brief conversation with the two customers while they were inside the business.

13. Lt. Platte asked if Chittum might recognize the persons if he saw them again. Chittum said he would. Lt. Platte provided Chittum with a photo lineup consisting of six individuals including William Alan Wolfe. The lineup was developed from Missouri Department of Revenue drivers license photographs. Chittum immediately identified the

photograph of Wolfe as the individual he saw in the store on July 7, 2009. Chittum said he was 100% sure Wolfe was the individual he saw in the store.

14. A search was conducted that determined the time it would take to travel from the Community State Bank, located at 300 East Hazel, Clarence, Missouri, to William Alan Wolfe's residence located at 6801 County Road 424, Fulton, Missouri. The estimated travel time is 2 hours and 8 minutes.

15. On Wednesday, July 8, 2009, law enforcement personnel responded to a bank robbery at the F&C Bank located at 1006 Eagle Crest Drive, Holden, Missouri. During the course of the investigation, it was learned that a lone white male entered the bank at approximately 9:15 am. Just prior to the bank robbery, employees at the bank observed the robber attempting to enter the bank through a rear door. Then the employees called 911.

16. The robber then walked around the bank and entered through the front door. As he was entering the bank, a customer was attempting to exit the bank. The robber pointed a silver handgun at the customer and ordered him to the floor. The robber proceeded to the teller counter area and ordered the victim teller, Cheryl Hoover, to provide him with the money from the teller drawers. The robber was described as being 5'7" to 5'9" with a stocky build, wearing a camouflage turkey hunting style mask and carrying a black duffle style bag. Hoover complied with the robber's demands and provided money to him.

17. Katheleen Kephart, Bank Manager, at F & C Bank, said that the deposits at the bank are insured by the FDIC under certificate number 9378, effective July 15, 2006. The loss sustained by the bank from the robbery is \$12,060.45.

18. After leaving the bank, the robber was observed walking to 58 Highway, which is located directly in front of the bank. After a few moments, the robber was seen entering a white four-door sedan being driven by an unknown white male. The vehicle then left the area heading east on Highway 58.

19. Approximately three miles east of the bank, the vehicle was spotted by a Deputy Sheriff with the Johnson County, Missouri Sheriff's Office. The Deputy attempted to stop the vehicle by activating his lights and sirens. At that time, the passenger in the vehicle fired multiple shots from what was believed to be a rifle, at the Deputy, striking his vehicle multiple times. The Johnson County Deputy and the Chief of Police for the Holden Police Department continued to pursue the vehicle occupied by the robber. During the pursuit, while the vehicles were moving, the robber continued to shoot at the Chief of Police, striking the police vehicle in the windshield and disabling the vehicle. Law enforcement responding to the robbery and shootings were able to see the vehicle from a distance as it fled.

20. During the canvass for the robbers, a Buick LaSabre was found engulfed in flames at 518 SW 301 Road, Chilhowee, Missouri. The vehicle was in the vicinity of where the robbers were last seen fleeing. The LeSabre was secured and towed back to the FBI in Kansas City, Missouri. It was examined by KCMOPD Forensic Specialist Steven Downing. Downing was able to identify the Vehicle Identification Number (VIN) number as 971G4HP52K6VH481449. A records check indicated that the VIN is associated with a 1997 Buick LeSabre, registered to William and Heather Wolfe, 6801 County Road 424, Fulton, Missouri. The vehicle license plates were missing. That vehicle was processed. Spent cartridge casings (.223 caliber) were recovered from the inside of the vehicle and are maintained as evidence.

21. Law enforcement continued to search for the individuals who were located in the Buick LeSabre. During the course of the investigation, a Chevy LS 4-door crew cab was reported stolen from a home located near where the burning vehicle was discovered.

22. On July 9, 2009, the Chevy LS 4-Door was located by the Missouri State Highway Patrol. It was partially submerged in the Missouri River near Boonville, Missouri. The vehicle was secured and processed.

23. On July 9, 2009, SA Leena Ramana contacted Cingular Wireless regarding cellular telephone number 573-239-0582, subscribed to by William Wolfe. The cellular number had been provided to the FBI by law enforcement officers with the Fulton, Missouri Police Department. Wolfe had previously provided this number to Fulton Police. SA Ramana obtained subscriber information along with cell site history for the dates of July 8, 2009 and July 9, 2009. There were no cellular calls placed or received on the target number for July 8, 2009, until 10:14 a.m, with the first cell tower reading occurring at 12:02 p.m. Analysis of the records provided the following information (times are approximate):

<u>Time:</u>	<u>Area of Cell Phone</u>
<u>July 8, 2009</u>	
12:02 p.m.	I-70 and Blackwater/Chouteau Springs
12:07 p.m.	I-70 and Boonville, Missouri
12:37 p.m.	I-70 and Highway 240
2:31 p.m. to 10:06 p.m.	Fulton, Missouri
10:37 p.m.	I-70 and Columbia, Missouri

A Google Maps search was conducted that determined the amount of time it would take to travel from the F&C Bank, located at 1006 Eagle Crest Drive, Holden, Missouri, which was robbed at approximately 9:15 a.m., on July 8, 2009, to the location at I-70 and Blackwater/Chouteau Springs is estimated to be an 1 hour and 42 minutes.

July 9, 2009

1:08 a.m.	Fulton, Missouri
2:09 a.m.	I-70 at Rocheport, Missouri
2:16 a.m.	Boonville, MO near Missouri River
2:27 a.m. to 3:44 a.m.	Boonville, Missouri
4:05 a.m.	I-70 and Merna, Missouri
5:00 a.m. to 5:30 a.m.	I-70 and Columbia, Missouri

Geographic plotting on the cell sites shows the cell phone moved eastbound along Interstate 70 to Fulton, Missouri, where the phone was stationary for a period of time. At approximately 1:08 a.m., the target phone traveled westbound on Interstate 70 until reached Boonville. At approximately 2:16 a.m., the target phone was in the vicinity where the stolen flatbed truck was recovered in the Missouri River by Missouri State Highway Patrol on July 9, 2009. The target phone left the area and returned to the Columbia, Missouri area, where it was last located at approximately 5:30 a.m.

24. A records check indicated that William Wolfe, DOB: April 6, 1981, described in the records of the Missouri Department of Revenue as 5'9" tall and 190 pounds and appearing from his photograph to be a white male, currently is receiving Medicaid, Food Stamps, Unemployment

Benefits and Mail at 6801 County Road 424, Fulton, Missouri. The address is located within the cell towers used while the phone was located in Fulton, Missouri.

The foregoing is true and correct to the best of my information and belief.

BENJAMIN KINSEY
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me

on this _____ day of July, 2009.

HONORABLE ROBERT E. LARSEN
United States Magistrate Judge
Western District of Missouri

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